

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

November 10, 2011

Dear ENERGY STAR® Imaging Equipment Partner or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) and the U.S. Department of Energy (DOE) have revised the Draft 1 test method as part of the ENERGY STAR imaging equipment specification revision and seek your additional comments on the enclosed Draft 2.

The development of the Draft 2 test method was a joint effort between EPA and DOE conducted in response to comments received during and after the distribution of the Draft 1 test method on July 8 and an online meeting on August 4. Please see below for the key modifications.

Proposed Modifications to the Test Method

EPA and DOE have made the following key modifications to the Draft 1, Version 2 Test Method, dated July 2011:

- **Draft Mode** – Added a notebox requesting stakeholder comments on an appropriate definition of Draft Mode that is based on quantifiable performance characteristics (Section 3)
- **IEC 62301** – Retained references to specific sections of IEC 62301 Edition 2.0 relating to the test setup (Section 4.A.) and removed those relating to OM power measurement, replacing them with explicit instructions. (Section 7.1.A)
- **Low Voltage Dc powered Products** – Expanded the test set up and addressed questions on the efficiency impacts of USB hubs and other low-voltage dc sources (Section 4.C and Section 5)
- **Product Speed for Calculation** – Clarified that print speed used for calculations and qualification is the highest claimed speed, while that for testing is the default as-shipped; proposed reporting of both speeds (Section 6.1.A)
- **Color Testing** – Re-iterated the absence of color testing in the Test Method due to the limited impact on energy consumption (Section 6.1.B)
- **Service and Maintenance Modes** – Added a requirement to disable service/maintenance modes prior to testing if possible and to provide instructions on disabling service/maintenance modes if not publicly available. (Section 6.1.D)
- **Network Connections** – Consolidated network connection protocol to one order of preference for all product types (Table 6)
- **Fax Machines** – Augmented the test method to allow for line simulators for testing fax machines and products incorporating fax machines (Section 6.2)
- **Driver Settings** – Clarified that key driver settings used during testing must correspond to the defaults upon shipment (Section 7.A)
- **Battery-operated products** – Further clarified the pre-test initialization of battery-operated products (Section 7.A)
- **Pre-conditioning for EP products** – Extended the initial pre-conditioning time to 2 hours prior to any testing of EP models to allow for drum warming (Section 7.A)
- **Digital Front-end (DFE) Testing** – Added a requirement that manufacturers directly report the dc power to the DFE without adjusting for any power supply inefficiency and report additional DFE measurements necessary for calculating a weekly DFE energy consumption (Section 10)

### Next Steps

EPA welcomes written comment from stakeholders on the modifications to the test method through **Wednesday, November 30, 2011**. (Note that a previous version of this memo, dated November 9, specified a comment deadline of November 18. The comment deadline has been delayed to accommodate further feedback from stakeholders.)

Please send all comments and supporting information to [imagingequipment@energystar.gov](mailto:imagingequipment@energystar.gov). All documents will also be posted to the ENERGY STAR Imaging Equipment Specification Revision page for your reference. To access them, please go to [www.energystar.gov/revisedspecs](http://www.energystar.gov/revisedspecs) and click on "Imaging Equipment".

On **Thursday, December 8, 2011**, EPA will hold an online stakeholder meeting to discuss the revised test method and received stakeholders' comments and concerns. **Please RSVP to [imagingequipment@energystar.gov](mailto:imagingequipment@energystar.gov) by Tuesday, December 6, 2011, to receive call-in information.** (Again, please note that a previous version of this memo, dated November 9, specified a webinar date of November 30 and RSVP deadline of November 28. These dates have also been delayed.)

Thank you for your continued support of ENERGY STAR. Please contact me at (202) 343-9046 or [kent.christopher@epa.gov](mailto:kent.christopher@epa.gov), Matt Malinowski, ICF International, at (202) 862-2693 or [mmalinowski@icfi.com](mailto:mmalinowski@icfi.com) with any questions or comments regarding this specification revision.

Sincerely,



Christopher Kent, EPA Product Manager  
ENERGY STAR Product Specification Development